

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

ELIZABETH HUNTER, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Civil Action No. 6:21-cv-00474-AA

DECLARATION OF CAMILLE D. LEE

I, Camille D. Lee, hereby declare, under penalty of perjury, that the following is true and correct to the best of my knowledge and belief:

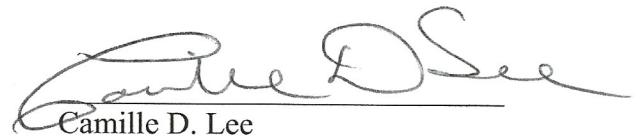
1. I am an attorney for the U.S. Department of Education (“Department”), Office for Civil Rights (“OCR”), Chicago Regional Office. As part of my duties, I investigate allegations of discrimination leveled against recipients of Federal financial assistance. I have served in this role for over eleven years.
2. I make this declaration based on my personal knowledge.
3. I am generally aware of litigation against the Department in the above-captioned matter.
4. On June 24, 2021, I received a complaint filed by Lauren Swain against Indiana Wesleyan University on behalf of Mortimer Halligan, which was forwarded from OCR’s Customer Service Team to the Chicago Regional Office.
5. On June 24, 2021, I sent an email to Ms. Swain informing her that I was the attorney assigned to evaluate Mortimer Halligan’s complaint.

6. On July 2 and July 22, 2021, I interviewed Mortimer Halligan via videoconference. Ms. Swain was present during the videoconference interviews.
7. I have read the Declaration of Lauren Swain (ECF No. 48) filed in this matter, which alleges in paragraph 7: “On August 2, 2021, I received an email from Ms. Lee notifying me that the OCR is likely to make its decision on the [Mortimer Halligan] case ‘soon.’”
8. I have also read the Corrected Declaration of Lauren Swain (ECF No. 61), filed in this matter, which deletes the allegation quoted above and instead alleges in paragraph 7: “On July 2, 2021, at the first meeting with Ms. Lee, Ms. Lee informed me that OCR planned to provide an answer on the religious exemption dismissal [in the Mortimer Halligan complaint] within two weeks. On July 22, 2021, at the second meeting with Ms. Lee, Ms. Lee informed me that she expected the OCR to have a response on the religious exemption dismissal within a couple of weeks.”
9. I submit this declaration to respond to the Corrected Declaration of Lauren Swain.
10. Pursuant to my normal practice, I did not provide a specific timeframe regarding OCR’s determination of Mortimer Halligan’s complaint, during my two interviews of Mortimer Halligan or otherwise. I do not provide specific timeframes on OCR determinations to complainants or their representatives.
11. Nor did I state that OCR would make a determination on a “religious exemption dismissal” “within two weeks” or “within a couple of weeks.”

12. Mortimer Halligan's complaint is still in evaluation pursuant to Article I of OCR's Case Processing Manual.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

8/27/2021
Date


Camille D. Lee